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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JAVIER AND LETICIA ZAMORA and  
DANIEL PEREZ and ELIZABETH  
PEREZ.

**Plaintiff.**

VS.

**WACHOVIA CORPORATION and  
WORLD SAVINGS BANK.**

### Defendants.

Case No.: C 07-4603 JSW

## **STIPULATION REGARDING ELECTRONIC DISCOVERY PROTOCOLS**

## The Honorable Jeffrey S. White

WHEREAS, by its order dated February 4, 2008, the Court set March 3, 2008 as the deadline to resolve confidentiality, electronic discovery and document preservation issues.

WHEREAS, Counsel for the parties have agreed upon an order governing the use of confidential information in conformance with this Court's standing order. The court

1 has approved the parties stipulated Protective Order Regarding Confidential, Trade Secret  
2 and Private Consumer Information.

3           WHEREAS, Counsel for the parties have circulated a comprehensive proposal for  
4 electronic discovery and document reservation issues, but have not completed their  
5 discussions on the proposed discovery protocol.

6           WHEREAS, the parties will continue to meet and confer on the proposed protocols  
7 for electronic discovery in an effort to reach agreement on the protocols.

8           NOW, THEREFORE, the parties stipulate to meet and confer on the proposed  
9 protocols for electronic discovery and report to the Court concerning their progress within  
10 the forthcoming two weeks.

11           Dated: March 3, 2008

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